

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GUERRIER HENRI,

Plaintiff,

-against-

THÉRIEL THÉLUS and SENET D. ACHILL,

Defendants.

Case No.: 24-cv-00329

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Daniel S. Szalkiewicz dated April 11, 2024 and the exhibits annexed thereto, defendants THÉRIEL THÉLUS and SENET D. ACHILL (collectively, the “Defendants”), by their undersigned attorneys, will move this Court at the United States District Court, Southern District of New York, 40 Foley Square, Courtroom 443, , New York, New York, before the Honorable Valerie E. Caproni, United States District Judge, on May 9, 2024, at 9:30 A.M. for an order pursuant to Fed. R. Civ. P. 12(b)(6), dismissing plaintiff Guerrier Henri’s Complaint dated January 16, 2024 (Dkt. No. 1) in its entirety (or, in the alternative, in part as to certain individual defendants) with prejudice; and further relief the Court may deem just and proper.

Dated: New York, New York
April 11, 2024

Respectfully Submitted,

By: /s/ Daniel S. Szalkiewicz
Daniel S. Szalkiewicz, Esq.
Cali P. Madia, Esq.
Daniel Szalkiewicz & Associates, P.C.
*Attorneys for Defendants Theriel Thelus and
Senet D. Achill*
23 West 73rd Street, Suite 102
New York, NY 10023
Tel: (212) 706-1007
Fax: (646) 849-0033
daniel@lawdss.com